

**Baker & Hostetler LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com  
Heather J. McDonald  
Email: hmcDonald@bakerlaw.com

*Attorneys for Irving H. Picard, Esq., as Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

SAGE REALTY;

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04400 (SMB)

LILLIAN M. SAGE, IN HER CAPACITY AS  
PARTNER OR JOINT VENTURER OF SAGE  
REALTY AND INDIVIDUALLY AS  
BENEFICIARY OF SAGE REALTY;

MALCOLM H. SAGE, IN HIS CAPACITY AS  
PARTNER OR JOINT VENTURER OF SAGE  
REALTY, INDIVIDUALLY AS BENEFICIARY OF  
SAGE REALTY, AND AS THE PERSONAL  
REPRESENTATIVE OF THE ESTATE OF LILLIAN  
M. SAGE;

MARTIN A. SAGE, IN HIS CAPACITY AS  
PARTNER OR JOINT VENTURER OF SAGE  
REALTY AND INDIVIDUALLY AS  
BENEFICIARY OF SAGE REALTY;  
AND

ANN M. SAGE PASSER, IN HER CAPACITY AS  
PARTNER OR JOINT VENTURER OF SAGE  
REALTY AND INDIVIDUALLY AS  
BENEFICIARY OF SAGE REALTY,

Defendants.

**SIXTH AMENDED CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures were served by: December 21, 2015
2. Fact Discovery was completed on: July 5, 2018
3. The Disclosure of Case-in-Chief Experts shall be due: January 16, 2019
4. The Disclosure of Rebuttal Experts shall be due: March 25, 2019
5. The Deadline for Completion of Expert Discovery shall be: May 6, 2019

6. The Deadline for Service of a Notice of Mediation Referral shall be: May 20, 2019
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: June 3, 2019
8. The Deadline for Conclusion of Mediation shall be: September 25, 2019

Dated: September 6, 2018  
New York, New York

By: /s/ Nicholas J. Cremona  
David J. Sheehan  
Email: [dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
Nicholas J. Cremona  
Email: [ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)  
Heather J. McDonald  
Email: [hmcdonald@bakerlaw.com](mailto:hmcdonald@bakerlaw.com)

**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Esq., as Trustee for  
the Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Estate of Bernard L. Madoff*

/s/ Andrew B. Kratenstein  
Consented To:

Andrew B. Kratenstein

**McDermott Will & Emery LLP**  
340 Madison Avenue  
New York, NY 10173-1922  
Telephone: (212) 547-5695  
Facsimile: (212) 547-5444

*Attorneys for Defendants*